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Attorneys for Philbert Cole

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.
PHILBERT COLE,

Defendant.

Case No.: 2:14-MJ-913 (PAL)

**STIPULATION TO CONTINUE
PRELIMINARY HEARING; AND ORDER**

This Stipulation is entered by and between Defendant PHILBERT COLE, by and through his counsel, Lisa A. Rasmussen, and THE UNITED STATES OF AMERICA, by and through its counsel, Assistant United States Attorney, Kimberly Frayn, as follows:

1. This case is currently set for preliminary hearing on Monday, March 2, 2015, at 4:00 p.m. The parties request that the preliminary hearing be continued to a time convenient to the Court, but not less than thirty days from the present setting.

2. Mr. Cole intends to enter a guilty plea in this case and additional time is needed for defense counsel to negotiate the details of the plea with the government and to review the negotiations with Mr. Cole.

1 3. Defense counsel has out of state travel planned for Thursday and
2 Friday, February 26 and 27th and she needs additional time to speak with the
3 government and meet with Mr. Cole.

4 4. It is anticipated that the parties will reach an agreement during
5 the first week of March and place this matter on calendar for entry of a plea
6 no later than March 13, 2015.

7 5. The government is not opposed to this request.

8 6. This request is not made for the purpose of delay and neither of
9 the parties are prejudiced by this request.

10 **IT IS SO STIPULATED.**

11 Dated: February 24, 2015

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13 LAW OFFICE OF LISA RASMUSSEN,

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15 */s/ Lisa A. Rasmussen*

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LISA A. RASMUSSEN, ESQ.
Attorney for Philbert Cole

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19 DANIEL BOGDEN
20 UNITED STATES ATTORNEY- NEVADA

21 */s/ Kimberly Frayn*

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By: KIMBERLY FRAYN, AUSA
Attorney for Plaintiff USA

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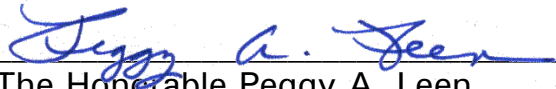
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28 STIPULATION TO CONTINUE PRELIMINARY HEARING; AND ORDER - 2

ORDER

Pursuant to the Stipulation of the parties, and good cause appearing,
IT IS HEREBY ORDERED that the preliminary hearing scheduled for
March 2, 2015 at 4:00 p.m., shall be rescheduled to the 2nd day of
April, 2015, at the hour of 4:00 p.m.

Dated: February 25, 2015


The Honorable Peggy A. Leen
United States Magistrate Judge